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Attorneys for the Debtors and
 Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	:
LEXINGTON PRECISION CORP., et al.,	: Case No. 08-11153 (SCC)
	:
Debtors.	: (Jointly Administered)
	:
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**NOTICE OF PRESENTMENT OF STIPULATION AND
 AGREED ORDER DEEMING PROOF OF CLAIM NO. 276 WITHDRAWN**

PLEASE TAKE NOTICE that the undersigned will present the annexed proposed stipulated agreement and order (the “**Proposed Stipulation**”) between Lexington Precision Corporation and Lexington Rubber Group, Inc. (together, the “**Reorganized Debtors**”) and the United Steelworkers (“**USW**”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **Thursday, October 28, 2010 at 12:00 p.m. (prevailing Eastern time).**

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Proposed Stipulation, if any, must (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”); and (c) set forth the name of the objecting party, the basis for the objection, and the specific grounds therefore. Any objections or responses must be filed with the Bankruptcy Court no later than **Wednesday, October 27, 2010 at 12:00 p.m. (prevailing Eastern time)** (the “**Objection Deadline**”). In accordance with General Order M-242, registered users of the Bankruptcy Court’s case filing system must file their objections and responses electronically. General Order M-242 may be found at www.nysb.uscourts.gov. All other parties-in-interest must file their objections and responses on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format) and deliver a hard copy directly to the chambers of Judge Shelley C. Chapman.

PLEASE TAKE FURTHER NOTICE that all objections and responses must be served so as to be received no later than the Objection Deadline, upon: (a) the Reorganized Debtors, Lexington Precision Corporation, 800 Third Ave. 15th Floor, New York, New York 10023 (Attn: Michael A. Lubin); (b) the attorneys for the Reorganized Debtors, Weil, Gotshal & Manges LLP, 1300 Eye Street, NW, Suite 900, Washington, DC 20005 (Attn: Adam P. Strochak), 767 Fifth Avenue, New York, New York 10153 (Attn: Marvin Mills); (c) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Paul Schwartzberg); (d) counsel for USW, Five Gateway Center, Room 807, Pittsburgh, Pennsylvania 15222 (Attn: David R. Jury).

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, a hearing will be held at the Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, at a date and time to be established by the Court. The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: October 1, 2010
New York, New York

/s/ Adam P./ Strochak
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Debtors.	:
	:
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Chapter 11
Case No. 08-11153 (SCC)
(Jointly Administered)

STIPULATION AND AGREED ORDER
DEEMING PROOF OF CLAIM NO. 276 WITHDRAWN

TO THE HONORABLE SHELLEY C. CHAPMAN,
UNITED STATES BANKRUPTCY JUDGE:

Lexington Precision Corporation and its wholly-owned subsidiary, Lexington Rubber Group, Inc. (together, the “**Debtors**” or the “**Reorganized Debtors**”), and the United Steelworkers (“**USW**”), hereby stipulate and agree that, subject to the terms and conditions herein, Proof of Claim No. 276 (the “**USW Claim**”) shall be deemed withdrawn as of July 30, 2010 (the “**Effective Date**”), and respectfully submit as follows:

RECITALS

A. USW is the bargaining agent of certain employees of the Debtors employed at the Debtors’ facility located at or around Rock Hill, South Carolina.

B. On April 1, 2008 (the “**Commencement Date**”), the Debtors and the USW were parties to a collective bargaining agreement covering the Rock Hill employees (the “**USW CBA**”). During the pendency of these chapter 11 cases, the USW CBA expired by its terms, and the Debtors and the USW agreed to renew and modify the USW CBA.

C. On or about August 15, 2008, the USW timely filed the USW Claim, in which the USW asserted claims relating to obligations arising under the USW CBA.

D. Pursuant to Section 8.1 of the Debtors’ *Fourth Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code*, dated May 26, 2010 (as further modified, the “**Plan**”), all executory contracts that the Debtors had not moved to reject prior to confirmation of the Plan, were deemed assumed. The Debtors never moved to reject the USW CBA. Accordingly, the Debtors assumed the USW CBA on the Effective Date.

AGREEMENT

1. Notwithstanding any provision of title 11 of the United States Code, the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and any order of this Court, the Reorganized Debtors and the USW agree to deem the USW Claim withdrawn as of the Effective Date.

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2. Nothing herein shall be treated as modifying or waiving any obligation of the Reorganized Debtors in connection with the USW CBA, as assumed, including the Reorganized Debtors' obligation to address through the grievance and arbitration procedure of the USW CBA any pending grievance, or any obligation arising under the USW CBA since the Effective Date.

AGREED TO THIS 1ST DAY OF OCTOBER, 2010

/s/ Adam P. Strochak

Richard P. Krasnow

Adam P. Strochak

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Attorneys for the Reorganized Debtors

/s/ David R. Jury

David R. Jury

Associate General Counsel

UNITED STEELWORKERS

Five Gateway Center, Room 807

Pittsburgh, Pennsylvania 15222

Telephone: (412) 562-2545

Facsimile: (412) 562-2574

Dated: October __, 2010

HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE